

Daniel C. Peterson, OSB No. 064664  
e-mail: dpeterson@cosgravelaw.com  
Amber A. Beyer, OSB No. 173045  
e-mail: abeyer@cosgravelaw.com  
COSGRAVE VERGEER KESTER LLP  
900 SW Fifth Avenue, Suite 2400  
Portland, Oregon 97204  
Telephone: (503) 323-9000  
Facsimile: (503) 323-9019

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

RAYMOND BALL, an individual, and JOSEPH  
TOTH, an individual,

Plaintiffs,

v.

MATTHEW CARSON, an individual,  
WILLIAM CARSON, an individual,  
TERRANCE THURBER, an individual,  
THOMAS THURBER, an individual, DG  
ROLLINS MINING, LLC, a Wyoming limited  
liability company, COLUMBIA GORGE DATA  
CENTER, LLC, a Nevada limited liability  
company, WHC & SWC INVESTMENTS, LTD,  
a Texas limited partnership, INTELLIGENT  
INVESTMENTS, LLC, a Texas limited liability  
company, and SNICKERS #1, LLC, a Texas  
limited liability company,

Defendants.

Case No. 3:19-cv-00242

**PLAINTIFFS' MOTION FOR  
EXTENSION OF TIME TO SERVE  
COMPLAINT ON DEFENDANTS**

Pursuant to Fed. R. Civ. Pro. 4(m) and 6(b), plaintiffs move for a 30-day extension, up to  
and including June 17, 2019, of the time to serve defendants with a summons and complaint.

Good cause exists for the requested extension because plaintiffs have been working to resolve

the case and have reached resolution with several defendants. Plaintiffs need additional time to serve the remaining defendants.

Plaintiff's motion is supported by the accompanying declaration of Daniel C. Peterson. No defendants have been served at this time. This motion is made in good faith and not for any improper purpose.

DATED: May 17, 2019

COSGRAVE VERGEER KESTER LLP



Daniel C. Peterson, OSB No. 064664  
E-mail: [dpeterson@cosgravelaw.com](mailto:dpeterson@cosgravelaw.com)  
Amber A. Beyer, OSB No. 173045  
E-mail: [abeyer@cosgravelaw.com](mailto:abeyer@cosgravelaw.com)  
Telephone: 503-323-9000  
Fax: 503-323-9019

*Attorneys for Plaintiffs*

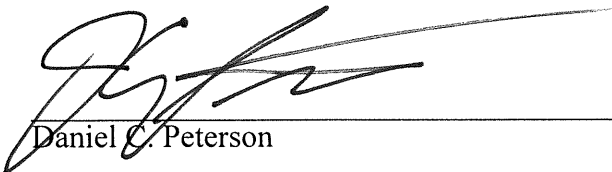
### **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO SERVE COMPLAINT ON DEFENDANTS to be served on the date indicated below by:

- ☐ mail with postage prepaid, deposited in the US mail at Portland, Oregon,
- ☐ hand delivery,
- ☐ facsimile transmission,
- ☐ overnight delivery,
- ☒ electronic filing notification.

If served by facsimile transmission, attached to this certificate is the printed confirmation of receipt of the document(s) generated by the transmitting machine. I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address(es) listed below:

DATED: May 17, 2019

  
Daniel C. Peterson